



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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November 16, 2021

**NOTICE OF OPPORTUNITY TO SUBMIT WRITTEN COMMENTS**  
**(By December 16, 2021, at 5 p.m.)**

RE: Inquiry to determine the appropriate process for clarifying whether Chapter 480-15 WAC allows household goods carriers to contract with third parties to provide services regulated by the Commission, Docket TV-210737

TO ALL INTERESTED PERSONS:

On May 8, 2020, the Washington Utilities and Transportation Commission (Commission) issued a Notice that the Commission will not Enter a Declaratory Order in Docket TV-200348 (Notice). The Notice responded to a petition filed by the Washington Movers Conference seeking a declaratory ruling from the Commission clarifying whether household goods carriers may contract with a third party for packing, unpacking, loading, unloading, pickup, and delivery services. The Commission declined to enter a declaratory order but recognized that the use of independent contractors in the household goods industry is an issue that requires further guidance from the Commission. To that end, the Commission directed Commission staff (Staff) to open an inquiry in a new docket by December 31, 2020, to consider whether a rulemaking or policy statement is the appropriate method to clarify and resolve these issues. The Commission later extended the deadline for opening this inquiry until September 30, 2021.

Consistent with the Commission's direction, Staff opened an inquiry on September 22, 2021, in Docket TV-210737 to determine the appropriate process for clarifying whether the existing household goods carrier rules, Chapter 480-15 WAC, allow household goods carriers to contract with third parties to provide services regulated by the Commission. To assist with this inquiry, the Commission first seeks to determine the scope and extent of regulated carriers' interest in contracting with third parties to provide regulated services.

**QUESTIONS FOR CONSIDERATION**

The Commission requests both general comments and responses to the questions provided below:

1. Do you currently contract with third parties to provide either regulated household goods services or non-regulated services?
2. If you contract with third parties to provide regulated services, how do you ensure compliance with Commission rules related to background checks, safety requirements, etc.?
3. If you do not currently contract with third parties to provide regulated services, are you interested in contracting with third parties to provide those services in the future?
4. If you are interested in using third parties to provide regulated services, what services would you consider using third parties to provide?
5. If you contract with third parties to provide non-regulated household goods services, how are those relationships structured? For example, how is payment rendered? Do you conduct background checks?
6. If you are a potential third-party contractor, how do you conduct background checks, and what safety requirements do you have in place to protect customers and employees?

## WRITTEN COMMENTS

Written comments filed in response to this Notice must be filed with the Commission no later than 5 p.m., December 16, 2021, and must be submitted in electronic form, pursuant to WAC 480-07-250(3). Those comments must be submitted via the Commission's web portal at [www.utc.wa.gov/e-filing](http://www.utc.wa.gov/e-filing) as provided in WAC 480-07-140(5). If you are unable to submit documents via the web portal, you may submit your comments by email to the Commission's Records Center at [records@utc.wa.gov](mailto:records@utc.wa.gov) or by mailing an electronic copy to the Commission's Records Center on a flash drive, DVD, or compact disc that includes the filed document(s). Comment submissions should include:

- The docket number of this proceeding (TV-210737).
- The commenting party's name.
- The title and date of the comments.

The Commission will post all written comments on its website at the following URL address: [www.utc.wa.gov](http://www.utc.wa.gov).

If you have questions about this Notice, you may contact Andrew Roberts at [andrew.roberts@utc.wa.gov](mailto:andrew.roberts@utc.wa.gov), or (360) 664-1101.

AMANDA MAXWELL  
Executive Director and Secretary